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for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,
v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and Bernard L.
Madoff,

Plaintiff,

v.

ESTATE OF ARNOLD M. SOSKIN; ARNOLD
M. SOSKIN REVOCABLE TRUST; RICHARD
N. SOSKIN, individually and in his capacity as

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04505 (SMB)

personal representative of the Estate of Arnold M. Soskin and as Trustee of the Arnold M. Soskin Revocable Trust; NANCY S. LURIE, individually and in her capacity as personal representative of the Estate of Arnold M. Soskin and as Trustee of the Arnold M. Soskin Revocable Trust; DEBRA BECKER; ROBERT S. SOSKIN; SAMUEL S. SOSKIN; and RENEE R. SOSKIN,

Defendants.

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL
OF ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), by and through their counsel, Baker & Hostetler LLP, and Defendants i) Estate Of Arnold M. Soskin; (ii) Arnold M. Soskin Revocable Trust; (iii) Richard N. Soskin, individually and in his capacity as personal representative of the Estate of Arnold M. Soskin and as Trustee of the Arnold M. Soskin Revocable Trust; (iv) Nancy S. Lurie, individually and in her capacity as personal representative of the Estate of Arnold M. Soskin and as Trustee of the Arnold M. Soskin Revocable Trust; (v) Debra Becker; (vi) Robert S. Soskin; and (vi) Samuel S. Soskin; by and through their counsel Stephen M. Pincus of Anthony Ostlund Baer & Louwagie, P.A.; and (viii) Renee R. Soskin, by and through her counsel, Lawrence M. Shapiro of Greene Espel, PLLP (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On November 30, 2010, the Trustee filed and served the Complaint against Defendants.
2. On March 2, 2015, Defendant Renee R. Soskin filed and served her Answer to the

Complaint on the Trustee.

3. On March 16, 2015, the remaining defendants filed and served their Answer to the Complaint on the Trustee.

4. Pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [Dkt. No. 3181], the Parties entered into a Settlement Agreement and Release on December 6, 2016.

5. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee's claims against Defendants in the above-captioned adversary proceeding and dismissal of the adversary proceeding with prejudice.

6. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

7. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

8. The Bankruptcy Court shall retain jurisdiction over this Stipulation.

Date: December 12, 2016
New York, New York

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Attorneys for Defendant Renee R. Soskin

SO ORDERED:

Dated: December 12th, 2016
New York, New York

/s/ STUART M. BERNSTEIN
Hon. Stuart M. Bernstein
United States Bankruptcy Judge